

Integration of Sustainability into Concessions Management

The 1916 Organic Act states that the mission of the National Park Service (NPS) is to *"...conserve the scenery and the natural and historic objects and the wildlife therein to provide for the enjoyment of the same in such a manner and by such means as will leave them unimpaired for the enjoyment of future generations."* NPS Management Policies translate this mission to commercial services operations. They specify that *"through the use of concession contracts or commercial use authorizations, the National Park Service will provide for commercial visitor services that are necessary and appropriate for public use and enjoyment"* and that *"Concession operations will be consistent to the highest practical degree with the preservation and conservation of resources and values of the Park unit. Concession operations will demonstrate sound environmental management and stewardship."*

The NPS administers over 600 concession contracts covering more than 20 types of visitor services from lodging to hunting guides. Concessioners serve hundreds of millions of visitors per year and are responsible for maintenance and operation of over 5000 assets. These operations provide the NPS with a large platform from which to fulfill these NPS goals. By operating facilities and services in a manner that minimizes the environmental footprint in the park and by demonstrating environmental best management practices, the NPS Commercial Services Program and its concessioners have become leaders in sustainability and a model for visitors.

Commercial Services integrates sustainable practice into all phases of the Concession Management process, from planning and contract award, to day-to-day contract management. Concessioners have responded to this challenge by implementing many innovations, demonstrating environmental stewardship, and becoming stewardship models for their industry peers. While there has been great success, opportunities for continuous improvement always exist. The processes that are currently in place and some of the successes that have been realized are described below.

Planning, Selection and Award

Per the NPS Management Policies, decisions to authorize park concessions must, in part, be based on a determination that the concessioner incorporates sustainable and environmentally preferable principles and practices into their operations.

The concession planning process begins with an assessment of whether the concession is necessary and appropriate, will not unduly impair park values and resources, and be consistent to the highest practical degree with the preservation and conservation of resources and values of the park area. Once this is determined, the park contract planning process includes an assessment of what facilities and aspects of the operation should be the focus of sustainable practices. The sustainability needs and opportunities at the park vary based on the park, services being provided, economic and technical feasibility and other factors. For example, the goal of marina operations may be to meet NPS and State Clean Marina criteria. The primary concern for horse operations may be manure management on trails. For food and beverage operations, it may be how the concessioner intends to provide sustainable foods. The focus at retail operations may be how the concessioner intends to reduce product packaging and sell environmentally preferable products. These objectives may then be translated into prospectus questions or specifically defined as contract requirements.

Through the planning and prospectus development process, sustainable practices may be specifically defined in the contract. For example, certain minimum environmentally preferable food standards, green procurement and solid waste and recycling requirements are commonly specified in operating or maintenance plans. Commercial Services maintains an index of "typical practices" based on industry practices that are referred to in this process.

Sustainability options may also be solicited through prospectus questions. The regulations at 36 CFR Part 51 defines the criteria by which the best offeror for a concession contract is selected. A primary selection factor is *"the responsiveness of the proposal to the objectives (described in the prospectus) of protecting, conserving, and preserving resources of the park area."* Environmental impacts are also addressed in a secondary selection factor that asks how the offeror will

“further the protection, conservation, and preservation of the park area and other resources through environmental management programs and activities such as energy conservation, waste reduction, and recycling.” Combined, these two factors constitute for more than 20 percent of the criteria for contract award. Through the planning process, the park can define, more specifically, what environmental sustainability objectives it desires in regards to these questions. Objectives range from water and air quality protection to night sky to energy reduction and sustainable design.

The competitive contracting process has resulted in a variety of innovative best management practices offered by concessioners that go beyond the basic sustainability requirements. These range from low-technology practices like composting coffee grounds and lemon peels at a food and beverage operation to major efforts such as using alternative energy vessels for transportation operations.

Contract Management

NPS Management Policies specify that concessioners are required to *“meet environmental compliance objectives by complying with all applicable laws pertaining to protection of human health and the environment; and incorporating best management practices in all operations, construction, maintenance, acquisition, provision of visitor services, and other activities under the contract.”* This is accomplished in several ways.

Environmental commitments made by the winning offeror in their bids that are desirable to the park are incorporated into the contract as operating and maintenance plan requirements. This ensures that the great ideas presented by the offerors are carried forward during the period of the contract.

As a contract requirement, documented Environmental Management Programs (EMPs) are required to be developed and implemented for all Category I and II contracts. These documents are prepared by the concessioner and define the goals and procedures concessioners have instituted to ensure they meet contract requirements for environmental compliance and best management practices as well as their own internal sustainability goals. This formal treatment of environmental programs in organizations has been shown to result in improved environmental performance and is common in industry and required of Federal agencies. Currently, approximately 177 concessioners have EMPs in place.

Third-party environmental compliance audits of concessioners are also conducted to evaluate their compliance with all applicable requirements. These audits are also used as an opportunity to provide technical assistance on environmental management and to identify other sustainable practices seen in the industry that could be voluntarily implemented as well as to identify things concessioners might already be doing on their own. To date, over 400 audits and associated technical assistance exercises have been conducted. Through this process, 175 exceptional practices have been identified in concession operations.

Finally, a review of the concessioner’s environmental performance, including a review of their EMP, audit-finding corrective actions, and operating and maintenance plan requirements is conducted as part of the concessioner’s annual evaluation process.

Recognition

As a result of the programs the NPS has implemented and the initiative shown by concessioners over the past 12 years, NPS concessioners have been recognized with 23 Departmental (Interior) and 29 NPS Environmental Achievement Awards. Award winners are highlighted in the semi-annual *Greenline Newsletter*. These newsletters are available on the [Commercial Services web site \(www.nps.gov/commercialservices\)](http://www.nps.gov/commercialservices). NPS concessioners have also received the Travel Industry Association's Odyssey Award; the Green Star Award from the Eagle Valley Alliance for Sustainability; the US Environmental Protection Agency (EPA) Region 9 Environmental Performance Award; the State of Arizona Governor’s Award; and, the EPA Environmental and Green Government Innovation Award, among others. In 2006, the Commercial Services Program itself was awarded a White House Closing the Circle Award for achievement in the integrating of environmental and sustainable strategies into concession contracts.

Challenges

Implementing sustainable practices into concession operations is not without its difficulties, both for the NPS and concessioners. Understanding and accounting for the economic costs and benefits of sustainable practices, ensuring both visitor satisfaction and sustainability objectives are being achieved, and dealing with infrastructure constraints that may be present in the park or park area, are just a few issues that are commonly identified. However, with sound management processes that advance sustainable practices in its business processes, and a concessioner community that is engaged and committed to helping the NPS meet its stewardship mission, additional leadership and success in NPS-concessioner sustainable practices is expected to continue.